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January 17, 2023

VIA ECF

Hon. P. Kevin Castel
United States District Judge
500 Pearl St.
New York, New York 10007

Re: Ex parte Application of Klein,
20 Misc. 203 (PKC) (S.D.N.Y.)

Dear Judge Castel,

We represent intervenors Gertrudes Benedek, Alexandre R. Benedek, Vivian Noemy Benedek Moas and Evelyn Benedek. No conferences before the Court are presently scheduled.

I write on behalf of all parties to submit for the Court's consideration the enclosed proposed protective order to govern the use and handling of confidential information produced by witnesses in response to subpoenas authorized by the Court's October 26, 2022 order. The language Individual Practice No. 4 requires for all confidentiality orders appears in paragraph 7(e) of the proposed order, on pages 7–8.

Respectfully submitted,

/s/ Luc W. M. Mitchell
Luc W. M. Mitchell